

1. Whether, the Department of Transportation's (DOT) conclusion that Frontier does not qualify as a "limited incumbent carrier" at Ronald Reagan Washington National Airport (DCA), and is therefore ineligible for the slot exemptions provided to a limited incumbent carrier under 49 U.S.C. § 41718(i)(3), is arbitrary, capricious, an abuse of discretion, contrary to statutory authorization, or otherwise contrary to law under 5 U.S.C. § 706; and

2. Whether DOT's conclusion that Alaska Airlines, Inc. (Alaska) qualifies as a "limited incumbent carrier" at DCA—and consequently awarding Alaska the only slot exemptions provided to a limited incumbent carrier under 49 U.S.C. § 41718(i)(3)—is arbitrary, capricious, an abuse of discretion, contrary to statutory authorization, or otherwise contrary to law under 5 U.S.C. § 706.

Respectfully submitted:

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DATED: January 17, 2025

CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2025, I caused a true and accurate copy of the foregoing Statement of Issues to be served by hand delivery upon the following:

Secretary Pete Buttigieg
United States of America Department of Transportation
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